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PATENT APPLICATION
SERIAL NO. 09/504,330

REMARKS

This application has been carefully considered in connection with the conversation of October 22, 2003. among the Examiner, Mr. Nguyen, Paul Learnon, a named inventor, and Alan Cooper, a representative of Applicants. Applicants' representative wishes to thank the Examiner for the courtesies extended during this conversation. Applicants contend that amended independent Claims 1, 17, 22, 26 and 30 are allowable over the cited prior art, as are their respective dependent claims.

Independent Claims 1 and 30 are amended to recite a hierarchical distribution of contact allocations or agent requirements, and the hierarchical distribution from a task type to two or more management units, respectively. Support for this Amendment can be found, among other places, on page 3, line 31 – page 4, line 10 of the present Application. The hierarchical distributions for a skills-based contact center claimed as cited in amended Claims 1 and 30 are not disclosed in the cited prior. Instead, there is no hierarchy containing a business unit. Hierarchical distributions can be advantageous in that the distribution from a higher business unit level unit to a lower level unit can be defined, thereby allowing for the distribution of phone calls among distinct call centers.

Independent Claims 1, 17, 22, 26 and 30 are amended. Claim 1, 17, 22, 26 and 30 are amended to recite that there are allocated scheduling requirements for agents from one or more business units at a first level, two or more contact types at a second level, and two or more management units at a third level. Claims 1, 17, 22, 26 and 30 is further amended to recite that there are a set of requirement allocations created that define how agent requirements are hierarchically distributed from two contact types to two or more management units. Support for this Amendment can be found, among other places, on

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page 3, lines 2 to line 10 of the present Application.

A distribution of contacts from one or more business units at a first level to two or more contact types at a second level, and to two or more management units to a third level is not disclosed, taught or suggested in the cited prior art. The prior art does not disclose such a distribution from a business unit in a skills-based contact center environment. The distribution between the levels of the invention of Claim 1, 17, 22, 26, and 30 can be advantageous in that it can enable calls to be handled in a plurality of locations, such as Boston and Dallas.

Independent Claims 1, 17, 22, 26 and 30 are amended. Amended Claim 1 recites that "agent availability data is predicted by schedule simulation of agents working their schedules and handling contacts in a skills-based contact center environment." Claims 17, 22, 26 and 30 are amended to recite the same, with minor variations. Claims 1, 17, 22, 26 and 30 are amended to recite "using the allocated forecasted agent requirements to generate a schedule for each of the plurality of scheduled agents." Support for these Amendments can be found, among other places, on page 9, line 26 to page 10, line 8 of the present Application.

Claim 1 has been still further amended to recite "repeating steps (a) – (d) until an output of a set of contact allocations and a set of requirement allocations occurs." Claim 17 is further amended to recite "(f) repeating the steps of (a)-(e) until an output of a set of contact allocations and a set of requirement allocations occurs." Claims 22, 26 and 30 are further amended to recite the same, with minor variations. Support for these Amendments can be found, among other places, on page 9, line 26 to page 10, line 8 of the present Application.

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The schedule simulation of agents working their schedules and handle contacts in a skills-based contact center environment, in combination with the step of repeating steps, such as the step of using the allocated forecasted agent requirements to generate a schedule for each of the plurality of schedule agents, until a set of contact allocations and a set of requirement allocations occurs, is not disclosed, taught or suggested in the cited prior art. In the cited prior art U.S. Patent No. 6,044,355 to Crocket et al., schedules are created iteratively in a skills-based contact center environment in a single site. The present invention of Claim 1, 17, 22, 26, and 30 however, use an iterative method of creating and simulating schedules to allocate contacts between multiple sites and to allocate requirements between multiple groups of agents. Iteratively repeating the allocation of forecasted contacts, and regenerating the schedule of the invention of amended Claim 1 can be advantageous, in that this can allow for scheduling solutions that are calculated to a desired degree of tolerance of an acceptable error.

In view of the foregoing, it is apparent that the cited references, either alone or in combination, do not disclose, teach or suggest the unique combination recited in independent amended Claims 1, 17, 22, 26, and 30. It is therefore submitted that amended Claims 1, 17, 22, 26, and 30 clearly and precisely distinguish over the cited references in a patentable sense, and is therefore allowable over these references and any remaining references of record. Accordingly, it is respectfully requested that the rejection of amended Claim 26 under 35 U.S.C. § 103(a) as unpatentable over the cited prior art be withdrawn.

Claims 2-7, 12-16, 19-21, 23-24, 26-28, and 31 depend from and further limit independent Claims 1, 17, 22, 26, and 30 in a patentable sense, and, for this reason and

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the reasons set forth above, are also deemed to be in condition for allowance.

Accordingly, it is respectfully requested that the rejections of dependent Claims 2-7, 12-

16, 19-21, 23-24, 26-28, and 31 be withdrawn, as well.

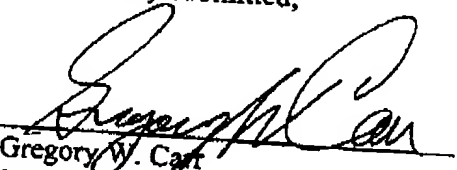
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Applicant has now made an earnest attempt to place this application in condition for allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests full allowance of Claims 1-7, 12-17, 19-24, 26-28, and 30-31.

Applicant files a request for a 3-month extension along with the Request for Continuing Examination; however, in the event that any other fees are due, the Commissioner is hereby authorized to charge any required fees due (other than issue fee), and to credit any overpayment made, in connection with the filing of this paper to Deposit Account No. 50-0605 of CARR LLP.

Should the Examiner have any questions or desire clarification of any sort, or deem that any further amendment is desirable to place this application in condition for allowance, the Examiner is invited to telephone the undersigned at the number listed below.

Respectfully submitted,

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